

1 COOLEY LLP
 2 BOBBY GHAJAR (198719)
 (bghajar@cooley.com)
 3 COLETTE GHAZARIAN (322235)
 (cghazarian@cooley.com)
 4 1333 2nd Street, Suite 400
 Santa Monica, CA 90401
 Telephone: (310) 883-6400
 5 KATHLEEN HARTNETT (314267)
 (khartnett@cooley.com)
 6 MARK WEINSTEIN (193043)
 (mweinstein@cooley.com)
 7 JUDD LAUTER (290945)
 (jlauter@cooley.com)
 8 ELIZABETH L. STAMESHKIN (260865)
 (lstameshkin@cooley.com)
 9 3175 Hanover Street
 Palo Alto, CA 94304
 Telephone: (650) 843-5000
 10 CLEARY GOTTLIEB STEEN & HAMILTON LLP
 ANGELA L. DUNNING (212047)
 (adunning@cgsh.com)
 11 1841 Page Mill Road, Suite 250
 Palo Alto, CA 94304
 Telephone: (650) 815-4131
 12 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
 KANNON K. SHANMUGAM (*pro hac vice*)
 (kshanmugam@paulweiss.com)
 13 2001 K Street, NW
 Washington, DC 20006
 Telephone: (202) 223-7300
 14 *[Full Listing on Signature Page]*
 15 *Counsel for Defendant Meta Platforms, Inc.*

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**
 21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,
 23 Individual and Representative Plaintiffs,
 24 v.
 25 META PLATFORMS, INC., a Delaware
 corporation,
 26
 27 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**NOTICE OF COMPLIANCE AND RESPONSE
TO ORDER REGARDING ALL OUTSTANDING
SEALING MOTIONS (DKT. 606)**

1 Pursuant to this Court’s Order Regarding All Outstanding Sealing Motions (Dkt. 606)
 2 (“Order”), Defendant Meta Platforms, Inc. (“Meta”) respectfully submits this Notice of Compliance
 3 and Response to the Order (“Notice and Response”). Meta hereby attaches as exhibits to this Notice
 4 and Response public, redacted copies of the “emails with third parties regarding licensing”
 5 identified in this Court’s Order. Dkt. 606. The table below cross-references these exhibits with the
 6 originally filed documents.

7

8 Document	9 Sealing
10 Ex. 1 - Exhibit 42 to Plaintiffs’ MSJ (Dkt. 473-41)	Redacted
11 Ex. 2 - Exhibit 43 to Plaintiffs’ MSJ (Dkt. 473-42)	Redacted
12 Ex. 3 - Exhibit 45 to Plaintiffs’ MSJ (Dkt. 474-1)	Redacted
13 Ex. 4 - Exhibit 141 to Plaintiffs’ Reply (Dkt. 522-3)	Redacted

14 Pursuant to the Order, Meta has redacted information necessary to prevent the disclosure of
 15 the identity of third-parties. Meta has also redacted information necessary to prevent the disclosure
 16 of Meta employee’s personal identifiable information (PII), namely, the email addresses and phone
 17 numbers of Meta’s individual employees. Meta has previously requested to seal documents based
 18 on the same personal identifiable information, (e.g., Dkt. 391-1 ¶ 5; Dkt. 409-1 ¶¶ 3, 7–8, 10; Dkt.
 19 567), which this Court has granted, (e.g., Dkt. 393; Dkt. 414; Dkt. 606).

20

21

22

23

24

25

26

27

28

1 Dated: July 17, 2025

COOLEY LLP

2 By: /s/ Matthew J. Brigham
3 Matthew J. Brigham4 COOLEY LLP
5 BOBBY GHAJAR (198719)
(bghajar@cooley.com)
6 TERESA MICHAUD (296329)
(tmichaud@cooley.com)
7 COLETTE GHAZARIAN (322235)
(cghazarian@cooley.com)
1333 2nd Street, Suite 400
Santa Monica, CA 90401
8 Telephone: (310) 883-64009 COOLEY LLP
10 MARK WEINSTEIN (193043)
(mweinstein@cooley.com)
11 KATHLEEN HARTNETT (314267)
(khartnett@cooley.com)
12 MATTHEW BRIGHAM (191428)
(mbrigham@cooley.com)
13 JUDD LAUTER (290945)
(jlauter@cooley.com)
14 ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
15 JUAN PABLO GONZÁLEZ (334470)
(jgonzalez@cooley.com)
3175 Hanover Street
16 Palo Alto, CA 94304
Telephone: (650) 843-500017 COOLEY LLP
18 PHILLIP MORTON (*pro hac vice*)
(pmorton@cooley.com)
19 COLE A. POPPELL (*pro hac vice*)
(cpoppell@cooley.com)
1299 Pennsylvania Avenue, NW, Suite 700
20 Washington, DC 20004-2400
Telephone: (202) 842-780021 CLEARY GOTTLIEB STEEN & HAMILTON
22 LLP
23 ANGELA L. DUNNING (212047)
(adunning@cgsh.com)
1841 Page Mill Road, Suite 250
24 Palo Alto, CA 94304
Telephone: (650) 815-413125 PAUL, WEISS, RIFKIND, WHARTON &
26 GARRISON LLP
27 KANNON K. SHANMUGAM (*pro hac vice*)
(kshanmugam@paulweiss.com)
2001 K Street, NW
28 Washington, DC 20006
Telephone: (202) 223-7300